

Exhibit 1
Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. ____

**ORDER (I) ENFORCING THE AUTOMATIC STAY AND (II) AWARDING
THE DEBTORS ATTORNEYS' FEES AND EXPENSES**

Upon the motion (the “Motion”)² of FTX Trading Ltd., FTX Canada Inc., and their affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”), (i) enforcing the automatic stay against Pateno and the Pateno Litigation, and (ii) awarding the Debtors attorneys’ fees and expenses against Pateno for its willful violation of the automatic stay and this Court’s order; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion. {1368.002-W0070764.}

therein has been provided in accordance with the Bankruptcy Rules and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and that no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The automatic stay is hereby enforced against Pateno, and no action against FTX Canada and the Deposit, including the Pateno Litigation, shall proceed outside of this Court without further order of the Court.
3. The Deposit may not be transferred out of the account in which it currently is held with the Escrow Agent pending further order of this Court.
4. Pateno is liable for the Debtors' attorneys' fees, costs, and expenses incurred as a consequence of its violations of the automatic stay and this Court's Automatic Stay Order, as to which the Debtors shall submit a certification of costs within 14 days of the entry of this Order, and as to which Pateno shall pay the Debtors within 28 days of the entry of this Order.
5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in the Motion or this Order shall be deemed or construed as an admission as to the validity or priority of any claim against the Debtors, and the Debtors retain all of their rights to contest any claims, including arising out of or related to the Pateno Litigation.

7. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge